

**United States Department of the Interior
Minerals Management Service
EIS Scoping for the Long Island Offshore Wind Project**

Comments
of
Renewable Energy Long Island, Inc. (RELI)

On
Minerals Management Service
Notice of Intent to Prepare an Environmental Impact Statement
for the
Long Island Offshore Wind Park

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We appreciate the opportunity to provide comments in response to MMS's Notice of Intent to prepare an Environmental Impact Statement (EIS) on the Long Island Offshore Wind Park (LIOWP). We have also signed on and submitted joint comments as part of the WindWorks Long Island coalition but are submitting the comments contained herein solely on behalf of Renewable Energy Long Island, Inc. (RELI).

RELI is a not-for-profit 501-c-3 organization advocating for the use of clean, renewable energy sources on Long Island.

RELI strongly supports the idea of an offshore wind park for Long Island. However, we can only support such a project if it is done in an environmentally acceptable manner, protecting our valuable marine life and coastal and ocean ecosystems, minimizing impacts on local and migratory bird populations, and avoiding unnecessary visual and noise impacts.

RELI believes that it is of paramount importance to ensure that the proposed LIOWP undergoes a rigorous and site specific environmental and regulatory review.

During the environmental review processes, MMS must assess the potential negative impacts and weigh them against significant positive environmental impacts and public benefits that renewable energy projects provide when compared to conventional electricity generation.

RELI believes that in order to meet a substantial portion of our energy demand in a sustainable manner, we must accelerate the deployment of larger-scale renewable energy projects that are commercially viable today. We also recognize that renewable energy infrastructure must be located close to where we need the power and will thus be visible. And we must overcome parochial Not-In-My-Back-Yard attitudes in favor of policies and projects that serve the broader public interest.

The Long Island Offshore Wind Park will allow us to harvest a clean, domestic and renewable source of energy right here at our doorstep, helping us to reduce air pollution and greenhouse gas emissions that lead to global warming and climate change, while keeping more of our energy dollars in our economy and strengthening national security.

In general, RELI believes that offshore wind technology as well as wave and tidal energy technologies have a significant and growing potential to provide us with clean, domestic and renewable sources of energy, thus offering important and much needed tools to reduce air pollution and greenhouse gas emissions that lead to global warming and climate change.

In its review, MMS should recognize that offshore renewable energy development is qualitatively different from offshore oil and natural gas development. First, harvesting a renewable energy source is non-extractive and does not deplete the resource. And secondly, environmental impacts from renewable energy projects are orders of magnitude lower than impact from oil and gas extraction and related activities. Therefore, we should strive to foster renewable energy development and ensure that regulatory review, permitting, and lease payments are designed to take these fundamental differences into account.

MMS should review the LIOWP proposal in accordance with existing federal laws to ensure appropriate and timely development of offshore renewable energy projects while protecting our environment.

Offshore wind energy parks have operated successfully in Europe for more than a decade and it is time that we also begin to harvest our significant domestic energy resource available in our offshore waters.

The advancement of the proposed Long Island project without unnecessary delay is particularly important given Long Island's extensive reliance on oil and natural gas for electricity generation and the resulting exposure to extremely high and volatile fuel cost.

The LIOWP can also play a vital role in preparing the path to develop deep water wind turbine and foundation technologies which will make it possible to site wind turbines at a distance from shore where they will not be visible thus enabling us to harvest much greater amounts of pollution-free and domestic energy sources.

While we wait for deep-water foundation technologies to become commercially available during the next couple of decades, we have the technology today to harvest this clean energy source in shallow water depths. And we have the responsibility to act now.

The Long Island Power Authority (LIPA) has pledged to meet New York State's Renewable Portfolio Standard, which requires that 25% of our electricity will be generated from renewable energy sources by 2013. It is unlikely that we could meet this requirement in a timely manner without the proposed offshore wind park.

Furthermore, New York State and a number of states in the Northeast have also established aggressive goals to reduce carbon dioxide emissions from the power sector as part of the Regional Greenhouse Gas Initiative (RGGI). Speedy deployment of renewable energy projects such as the LIOWP is crucial in order to meet RGGI goals.

Therefore, MMS should work with LIPA and other state agencies and stakeholders to ensure full environmental review of this renewable energy project while not unduly delaying what could become America's first offshore wind park. MMS should work with

state regulators in a coordinated manner. This will help avoid unnecessary delay and reduce development cost for the LIOWP.

We offer the following issues for initial consideration for Scoping Issues as part of the Draft EIS:

Environmental

Given that this project may be the first offshore wind park in North America, it is important that the EIS contain a comprehensive review of all potentially significant negative environmental impacts that could result from the project during construction, operation, and decommissioning. The goal of this review is to avoid or minimize impacts on valuable marine life, coastal and ocean ecosystems, as well as local and migratory bird populations. Among the issues that must be addresses should be:

1. Impacts on migratory bird populations
2. Impacts on endangered species
3. Impacts on marine life and environment, including ocean bottom impacts
4. Impacts on marine mammals from potential underwater noise or vibrations during construction, operation, and decommissioning
5. Potential mitigation issues and measures

These and other potentially negative environmental impacts must be weighed against *positive* impacts or benefits that are typically derived from renewable energy projects, including

6. Pollution avoidance and resulting air/water quality and public health benefits
7. Greenhouse gas emission avoidance and mitigation of global warming and climate change impacts
8. Impacts from “no action” alternative, i.e. fossil fuel extraction, combustion and construction and operation of additional conventional power generation facilities

Economic

9. Impacts (positive or negative) on tourism, beach activities, boating and other recreational uses
10. Impact on commercial and recreational fisheries
11. (Most likely positive) impacts on local, regional and national economy due to avoidance of purchase of imported fossil fuels
12. (Most likely positive) impact on price stability of electric rates
13. (Most likely positive) impacts on economy due to job creation and other secondary or indirect economic benefits typical of renewable energy technologies

Other

14. Aesthetic impacts
15. (Most likely positive) impacts on national security
16. (Most likely positive) impacts on secure energy supply and diversified energy portfolio

Post-Construction

17. Mitigation

Once the LIOWP is constructed, certain adaptive mitigation measures may be required. MMS should seek to anticipate this and negotiate mitigation plans with the developer and LIPA during the permitting phase. In doing so, MMS must carefully balance the need to provide protection against unforeseen impacts with the developer's need to contain liability costs in order to keep the project financially feasible.

18. Decommissioning

MMS should also ensure that the LIOWP will be properly decommissioned once

it has reached the end of its operational lifetime or becomes non-operational for other reasons.

We submit our comments and this list of issues for scoping consideration with the knowledge that it is an incomplete list and with the hope that other stakeholders will contribute equally important issues that warrant inclusion in the Draft EIS. We hope that MMS will give careful consideration to all comments and submissions and select the issues that warrant study and review as part of the DEIS.

RELI looks forward to working with MMS and all parties as the regulatory review process moves forward.

Respectfully submitted by:

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